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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AGERE SYSTEMS, INC., CYTEC
INDUSTRIES INC., FORD MOTOR
COMPANY, SPS TECHNOLOGIES, LLC and
TI GROUP AUTOMOTIVE SYSTEMS LLC,

Plaintiffs,

vs.

ADVANCED ENVIRONMENTAL
TECHNOLOGY CORPORATION, et al.,

Defendants.

Civil Action No. 02-CV-3830 (LDD)

**DECLARATION OF LAURIE J. SANDS,
ESQ. IN OPPOSITION TO PLAINTIFFS'
AND HANDY AND HARMAN'S
MOTIONS IN LIMINE WITH RESPECT
TO THE EPA ADMINISTRATIVE
DEPOSITION TESTIMONY, MARVIN
JONAS DEPOSITION TESTIMONY
AND THE EPA WITNESS SUMMARIES**

LAURIE J. SANDS, ESQ. pursuant to 28 U.S.C. §1746, hereby declares as follows:

1. I am an attorney at law admitted to practice in the State of New Jersey. I am associated with the firm of Wolff & Samson PC, attorneys for defendant, Advanced Environmental Technology Corporation, in the above-captioned matter. As one of the attorneys with principal responsibility for this case, I am fully familiar with the facts and circumstances set forth below. I submit this Declaration in opposition to Plaintiffs' and Handy and Harman's Motions in Limine with respect to the EPA administrative deposition testimony, Marvin Jonas deposition testimony and the EPA witness summaries.

2. I have been admitted *Pro Hac Vice* in the Eastern District of Pennsylvania for the purposes of representing AETC in this matter.

3. Attached to this Declaration as Exhibit A are true and complete copies of Deposition Excerpts from the Deposition of Manfred DeRewal, Sr., May 9, 2003.

4. Attached to this Declaration as Exhibit B are true and complete copies of Deposition Excerpts from the Deposition of Manfred DeRewal, Jr., May 13, 2003.

5. Attached to this Declaration as Exhibit C are true and complete copies of the United States Environmental Protection Agency's Witness Summaries of Handy and Harman employees.

6. Attached to this Declaration as Exhibit D is a true and complete copy of Nigroni v. Trump Plaza Associates, et al., 54 Fed.Appx. 31, 2002 WL 31492370 (3rd Cir. Nov. 8, 2002).

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 6, 2008.

/s/ Laurie J. Sands
LAURIE J. SANDS, ESQ.